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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PETER DELVECCHIA, *et al.*,

Plaintiffs,

vs.

FRONTIER AIRLINES, INC., *et al.*,

Defendants.

Case No.: 2:19-cv-01322-KJD-DJA

**SUPPLEMENT TO PLAINTIFFS’
OPPOSITION (ECF NO. 217) TO
FRONTIER’S MOTION FOR
PROTECTIVE ORDER (ECF NO. 215)**

Plaintiffs, Peter DelVecchia (“Peter”) individually and as next friend of A.D., a minor, by and through counsel, respectfully file this Supplement to Plaintiffs’ Opposition (ECF No. 217) to Defendant Frontier Airlines, Inc.’s Motion for Protective Order (ECF No. 215).

Frontier’s Reply (ECF No. 222) and Plaintiffs’ Opposition both refer to a live deposition that was taken on the same day as the Opposition was filed and for which a written transcript was not yet available. The transcript of that deposition of passenger witness Aricia Binder is attached hereto as Exhibit A (the testimony referenced in the briefs is at pp. 22-34 of the transcript).

The Opposition also referred to Frontier’s objection to a subject area of the deposition notice concerning why Frontier did not provide a manifest showing all passenger names to the crew of Flight 2067, *see* ECF No. 217 at 5, 7-8. Frontier’s Reply argued that

1 the reasons for not providing the manifest were irrelevant since Plaintiffs' "allegations" are
 2 that Defendant Warren knew that Peter and A.D. are related," *see* ECF No. 222 at 8. Frontier
 3 does not cite to any specific allegation of the Third Amended Complaint in that argument.
 4 At his deposition taken the month before the Opposition was filed, Former LVMPD Sergeant
 5 Francois Obasi testified that upon reaching the door of the aircraft when it landed at Las
 6 Vegas, he observed a female flight attendant declaring "I'm not sure they're even related" in
 7 reference to Peter and A.D. Mr. Obasi's deposition transcript and exhibits are attached hereto
 8 as Exhibit B (the relevant testimony appears on p. 18 of the transcript).

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 11 DATED this the 6th day of June, 2023.

12
 13 /s/ Margaret A. McLetchie

14 MARGARET A. MCLEATCHIE, Nevada Bar No. 10931

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